

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of:

Petition of the Public Service Commission
of Wisconsin for Delegation of
Additional Authority to Implement
Number Conservation Measures

NSD File No. L-99-64

Petition for Declaratory Ruling and Request
for Expedited Action On the July 15, 1997
Order of the Pennsylvania Public Utility
Commission Regarding Area Codes
412, 610, 215 and 717

NSD File No. L-97-42

Implementation of the Local Competition
Provisions of the Telecommunications
Act of 1996

CC Docket No. 96-98

COMMENTS OF MCI WORLDCOM, INC.

MCI WorldCom, Inc. (MCI WorldCom) hereby submits comments on the Petition of the Public Service Commission of Wisconsin (PSCW) for additional authority to implement number conservation measures. The PSCW seeks authority to: (1) enforce current standards for number allocation, or to set and enforce new standards; (2) order efficient number use practices within NXX codes; (3) order the return of unused and reserved NXX codes, as well as thousands blocks if number pooling is implemented; (4) order number utilization and forecasting reporting, and to audit such reporting; (5) investigate and order unassigned number porting; (6) investigate and order additional rationing measures; (7) implement mandatory thousands block number pooling.¹

With its petition, the PSCW joins the growing list of states that have sought additional

¹ PSCW Petition at 2.

authority over numbering administration. MCI WorldCom has commented on each of those petitions. We have also submitted extensive comments on the Commission's Notice of Proposed Rulemaking on Numbering Resource Optimization, which address, *inter alia*, the same questions raised in the state petitions. The PSCW's petition does not raise any new issues. Nor does it offer any new arguments in support of its request. Rather than repeat ourselves again, MCI WorldCom incorporates by reference its comments in each of those proceedings.² For the reasons given in those comments the Commission should:

² Comments of MCI WorldCom, *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, New York Department of Public Service Petition for Additional Authority to Implement Number Conservation Measures, Massachusetts Department of Telecommunications and Energy Request for Additional Authority to Implement Various Code Conservation Measures in the 508, 617, 781, and 978 Area Codes, Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717*, CC Docket No. 96-98, NSD File No. L-99-21, NSD File No. L-99-19, NSD File No. L-97-42 (filed 4/5/99);

Comments of MCI WorldCom, *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Maine Public Utility Commission's Petition for Additional Delegated Authority to Implement Number Conservation Measures, Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717*; CC Docket No. 96-98, NSD File No. L-99-27, NSD File No. L-97-42 (filed 5/3/99);

Comments of MCI WorldCom, *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Florida Public Service Commission's Petition for Authority to Implement Number Conservation Measures, Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717*, CC Docket No. 96-98, NSD File No. L-99-33, NSD File No. L-97-42 (filed 5/14/99);

Comments of MCI WorldCom, *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, the Petition of the California Public Utilities Commission and the People of the State of California for Delegation of Additional Authority Pertaining to Area Code Relief and to NXX Code Conservation Measures, Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717*, CC Docket No. 96-98, NSD File No. L-99-136, NSD File No. L-97-42 (filed 6/14/99);

Comments of MCI WorldCom, *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Connecticut Department of Public Utility Control's Petition for Delegation of Additional Authority to Implement Area Code Conservation Measures,; Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717*, CC Docket No. 96-98, NSD File No. L-99-62, NSD File No. L-97-42 (filed 9/7/99).

Comments of MCI WorldCom, *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Texas Public Utility Commission Petition for Delegation of Additional Authority to Implement Area Code Conservation Measures, Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717*, CC Docket No. 96-98, NSD File No. L-99-55, NSD File No. L-97-42 (filed 8/16/99).

- Deny the PSCW's request to enforce existing number allocation standards or to set and enforce new standards.
- Grant the PSCW's request to order efficient number use practices within NXX codes, as long as service providers are permitted to depart from those practices to respond to specific customer requests.
- Deny the PSCW's request to order the return of unused and reserved NXX codes or thousands blocks.
- Clarify that the PSCW may obtain number utilization and forecasting information that is already gathered by service providers. Deny the PSCW's request for authority to audit such utilization and forecasting information.
- Grant the PSCW's request for authority to investigate and order unassigned number porting (UNP) insofar as it would not require a neutral third party administrator. MCI WorldCom has previously described how a limited version of UNP could be accomplished by direct carrier-to-carrier interaction, using existing systems and processes.
- Deny the PSCW's request to investigate and order additional rationing measures. The PSCW flatly asserts that this authority would be exercised "in an attempt to help delay the need for area code relief."³ It is clear that state commissions may not use rationing as way to avoid area code relief. Rationing is an emergency measure that can only be used to prevent exhaust from occurring prior to a relief date that has already been determined.
- Deny the PSCW's request for authority to implement mandatory thousands block number pooling. Insofar as the Commission decides to grant this request, it should condition its grant on a requirement that pooling not be implemented until NPAC release 3.0 is ready for deployment.

MCI WorldCom urges the Commission to act as quickly as possible on its Notice of Proposed Rulemaking on Numbering Resource Optimization.⁴ A national plan to conserve

³ PSCW Petition at 7.

⁴*In the Matter of Number Resource Optimization, Connecticut Department of Public Utility Control Petition for Rulemaking to Amend the Commission's Rule Prohibitinh Technology-Specific or Service-Specific Area Code Overlays, Massachusetts Department of Telecommunciations and Energy Petition for Waiver to Implement a Technology-Specific Overlay in the 508, 617, 781 and 978 Area Codes, California Public Utilities Commission and the People of the State of California Petition for Waiver to Implement a Technology-Specific or Service Specific*
(continued...)

resources and prepare for expansion of the numbering plan is needed to ensure coordinated, effective action. Uniform national numbering administration is critical to the development of competition in all telecommunications markets. The Commission must resist any temptation to cede significant authority over numbering administration to fifty state commissions and the state legislatures to which they answer.

Respectfully submitted,
MCI WorldCom, Inc.



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September 13, 1999

⁴(...continued)

Area Code, Notice of Proposed Rulemaking, CC Docket No. 99-200, RM No. 9258, NSD File Nos. L-99-17, 36
(June 2, 1999)

CERTIFICATE OF SERVICE

I, Vivian Lee, do hereby certify that copies of the foregoing Comments of MCI WorldCom Inc. were sent via first class mail, postage paid, to the following on this 13th day of September, 1999.

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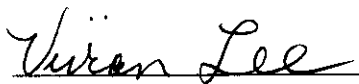
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